

State of California



Fair Political Practices Commission

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322-6441

February 15, 1985

Marialee Neighbours
Alliance of American Insurers
220 Sansome Street, Ste. 1320
San Francisco, CA 94104

Re: Our File No. A-85-021

Dear Marialee:

Thank you for your letter of January 24, 1985, requesting advice with respect to the lobbying disclosure provisions of the Political Reform Act (Government Code Sections 81000-91014).

According to your letter, Professional Women Advocates, an organization of registered lobbyists, is hosting a reception for legislators on February 26. Each member of the organization will pay \$15 toward the cost of the reception, although it is anticipated that only a portion of each member's payment will be used in connection with the event. You asked how the members of your organization should report the reception on their quarterly Lobbyist Reports (Form 620).

Each lobbyist must report the reception in the "Activity Expenses" portion of the Form 620 (Part III, Section A.2.), and must provide the name and official position of each reportable person who is a guest at the event and the total amount of benefit provided to each. To determine the amount of benefit provided, you should divide the entire cost of the event by the total number of people who attended. For example, if the cost of the event is \$300 and a total of 50 people attend, including the hosting lobbyists, the pro rata cost per person will be \$6. Each lobbyist must report the entire \$6 as the amount benefiting each official. In the "Total Amount of Activity" column, each lobbyist will report that portion of her \$15 payment which was actually used to pay for the reception, and as a footnote will indicate the entire cost of the event, the number of people who attended, and that her payment represents a portion of the total cost of the event. Assuming it was not used to benefit officials, the portion of the \$15 payment which was not used to pay for the

Mariale Neighbours
February 15, 1985
Page 2

reception will be reported as a "General Lobbying Expense." Finally, the lobbyists must also retain in their records a list of the non-reportable persons who attend as guests.

You also asked about the \$10 gift prohibition. Government Code Section 86203 prohibits lobbyists from making or arranging for the making of gifts to one legislative or administrative official aggregating \$10 in a calendar month. Therefore, the pro rata benefit to each individual legislator should not exceed \$10. In addition, each lobbyist will need to aggregate the benefit to each legislator attending the event with any other gifts that lobbyist has made to that legislator during the calendar month.

I hope this answers your questions. Please let me know if you need any further information.

Sincerely,



Carla J. Wardlow
Political Reform Consultant



James S. Stickles
Regional Vice President

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Pacific Region

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415•362•0870

January 24, 1985

Ms. Carla Wardlow
FAIR Political Practices Commission
P. O. Box 807
Sacramento, California 95804

Dear Carla:

This letter will confirm my telephone conversation with you regarding lobbyist reporting for the Professional Women Advocates' reception on February 26. As I indicated to you, we will be hosting a reception for California legislators and will be collecting \$15.00 from our members. However, only a portion of that \$15.00 will go for cost of the reception which will be less than \$10.00 per person.

Could you please send me a letter indicating how our lobbyist members should report this \$15.00 contribution to the Professional Women Advocates when completing their lobbying reports. Additionally, I would appreciate it if you could restate your comment that each lobbyist must be cautioned not to spend more than \$10.00 per legislator in the entire month of February. As I recall, you indicated that, if a lobbyist had, for example, spent \$3.00 on a legislator for the month of February, then that lobbyist could only spend another \$7.00 on that same legislator.

Thank you so much for your help.

Best regards.

Sincerely,

*Marialee Neighbours
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Marialee Neighbours
Assistant Vice President and Counsel

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